

EXHIBIT 116

M. Perkins

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

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DEXIA SA/NV, DEXIA HOLDINGS, INC.,
FSA ASSET MANAGEMENT LLC and
DEXIA CREDIT LOCAL SA,

EFC Case

Plaintiffs,

No. 12-cv-1761 (JSR)

vs.

BEAR STEARNS AND CO., INC., THE
BEAR STEARNS COMPANY, INC., BEAR
STEARNS ASSET BACKED SECURITIES I
LLC, EMC MORTGAGE LLC (f/k/a EMC
MORTGAGE CORPORATION), STRUCTURED
ASSET MORTGAGE INVESTMENTS II, INC.,
J.P. MORGAN MORTGAGE ACQUISITION
CORPORATION, J.P. MORGAN SECURITIES
LLC (f/k/a JPMORGAN SECURITIES, INC.),
WAMU ASSET ACCEPTANCE CORP., WAMU
CAPITAL CORP., WAMU MORTGAGE
SECURITIES CORP., JPMORGAN CHASE & CO.,
and JPMORGAN CHASE BANK, N.A.,

Defendants.

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VIDEOTAPED DEPOSITION OF MATTHEW PERKINS

New York, New York

Friday, February 1, 2013

Reported by:

THOMAS A. FERNICOLA, RPR

JOB NO. 57721

1 M. Perkins

2 Q. The firm had decided not to as a 13:17
3 policy conduct due diligence on the underlying 13:17
4 collateral for offerings that you worked on 13:17
5 during 2006 and 2007 do you believe you would 13:17
6 have been made aware of that policy change? 13:17

7 A. I haven't made aware of it to my 13:17
8 knowledge. I made not everybody told. 13:17

9 Q. Where were those Clayton auditions 13:17
10 report for the Impac offerings we have been 13:17
11 discussing for 2006 and 2007 where would those 13:18
12 be stored at Bear Stearns? 13:18

13 A. The deal managers would have kept 13:18
14 them in some file some common drive or some 13:18
15 sort of storage area. 13:18

16 Q. Were you aware there a Bear Stearns 13:18
17 had an FTP site at the time that you due 13:18
18 diligence providers could upload their due 13:18
19 diligence reports on a daily basis? 13:18

20 A. I don't recall. What is an FTP site. 13:18

21 Q. A web site that somebody could log 13:18
22 into and then upload instead of sending large 13:18
23 e-mail attachments that enclosing up 13:18
24 everybody's e-mail? 13:18

25 A. Okay. 13:18